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via fax
Columbia River Crossing

To: Columbia River Crossing
From: Councilor Robert Liberty *RL*
RE: Comments on the Draft EIS
Date: July 1, 2008

Total Pages including this cover: 9

Thank you for the opportunity to submit comments on the Draft Environmental Impact Statement. I have included two documents: a memo from me to Councilor Burkholder dated October 2, 2006, and a letter to the CRC Task Force signed by all Metro councilors dated October 19, 2006.

Councilor Robert Liberty

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METRO

TO: Rex Burkholder
FROM: Robert Liberty
DATE: October 2, 2006
RE: Comments on Columbia Crossing Alternatives
COPY: Councilors, Michael Jordan, Andy Cotugno

I have quickly reviewed the September 20, 2006 "Draft Memorandum: Considerations for Replacing Versus Reusing the Existing Interstate 5 Bridges" and "Preliminary Alternative Packages; Columbia River Crossing" dated 08/09/06 and "Final Problem Definition" dated December 27, 2005. Below are some questions and comments.

Observations about the Problem Definition

The problem is defined entirely in terms of vehicle movement (cars, trucks, bikes, pedestrians, transit) and safety.¹ The definition does not encompass the *sources* of the congestion (greater job growth south of the Columbia; more houses north of the Columbia) nor does it articulate any broader purpose for the bridge improvements (urban design, economic development, environmental or equity goals of some kind.) In other words, vehicle movement and related safety are stated as the ends, not the means.

The problem definition also does not indicate relative importance of the various objectives identified (e.g. safety versus speed, freight², transit, cars, barge traffic) nor does it indicate any limitations on the costs of possible solutions. Instead each of these objectives is treated as essential and as the grounds for eliminating some alternatives from consideration. Similarly, the project website gives the percentages of traffic in various categories, (local, regional, long distance, etc.) but does not indicate which of these movements is more or less important.

¹ See:

<http://www.columbiarivercrossing.org/materials/MeetingMaterials/010406%20CRC%20Problem%20Definition%20Final.pdf>)

² Here is an illustration of the need for some quantification and priority setting regarding objectives. An April 2003 report by ODOT, Cambridge Systematics and David Evans, entitled Regional Economic Effects of the I-5 Corridor/Columbia River Crossing Transportation Choke Points, noted that without a new or upgraded bridge the value of congestion-caused delays for trucks on I-5 would increase by \$20 million per year. Assuming a 5.5% return on \$1.5 billion that would be invested in a new bridge, the opportunity cost of the new bridge is about \$83 million/year or four times the value of the increased truck congestion.

Finally, I note that the problem definition is presented in terms of the study area, which is a corridor along I-5 between 134th in Vancouver and the I-5/I-405 junction. The interrelationship with I-205, with I-5 through central Portland (and beyond) and with regional land development patterns are not discussed (in these documents at least.)

This narrow focus helps explain what I believe are some deficiencies in the range of alternatives considered.

Recommendation: Given our discussions about the importance of the purpose statement/problem definitions for other projects, it would be appropriate for the Council to offer a comment on the problem definition for this project.

Alternatives Packages:

The first thing that caught my eye is that the maps presented with the alternatives packages. They show only the area from Columbia Slough to about 45th in Vancouver; no alternatives discuss how changes or improvements outside this small area might address some of the issues related to congestion.

With respect to the structural alternatives, they all assume the construction of a new bridge; either a replacement bridge or a supplemental bridge.

There is no proposal that includes modifications to I-205.

There is no element in any alternative that proposes changes to the downstream rail bridge, even though the problem definition discusses the challenge for barges trying to make the swerve between the two openings. (See also section 4, "Navigation Considerations" in the Replacement versus Re-use memo.) One way to address that particular problem is to remodel or rebuild the I-5 bridge, the other is to modify the rail bridge.

The non-structural alternative (or supplement) is described as "Transportation System Management/Transportation Demand Management Focus". All that is provided under the section devoted to "Transportation System/Transportation Demand Management" in this alternative are the words "Aggressive level." What falls under this heading and at what level of cost? Does it include tolling on I-5 and I-205? Does it include employee trip options? ITS elements? Does it include accident and incident responses?

It does not appear to include any change in land use designations or plans. Possible changes to land use patterns deserves its own alternative but as far as I can tell it is not considered at all.

Finally, there is something unreal about presenting these alternatives without even a preliminary discussion of cost/benefit ratios, without any consideration of induced demand or land use impacts, without any acknowledgement of financial constraints and without any indication of the relative importance of different trip movements.

Comments on Draft Memo on Considerations for Replacement Versus Reuse of Existing I-5 Bridges

The memo outlines many important issues but suffers from some serious limits as a basis for making a decision. These limitations include:

- The memo lists “costs” as a “key issue” but does not actually provide any cost information on the various replacement versus re-use options. (At page 11 the memo notes that cost estimates will be available in November³; however all of these costs are hard construction and demolition costs.) Instead it offers *opinions* about costs. For example on page 3, the memo states: “Upgrading the existing bridges to reduce vertical grades and provide sufficient shoulder widths is not prudent because it is too expensive. Reducing the vertical grades would require significant modifications to piers and reconstruction of selected truss spans. Though technically feasible, this would be prohibitively expensive and would impact river navigation by lowering vertical clearance under the high span channel.” (Note: There is no discussion of raising the length bridges in order to reduce vertical grades while increasing barge clearance.)

Under section 3.5 it references the conclusion of a seismic panel which met for a two-day workshop⁴: “The panel determined that it is technically feasible to retrofit the existing bridges to a level of service that would meet “no collapse” criteria, though the expense could be equal to a substantial portion of the cost of a new structure.” What does “substantial portion” of the cost mean – 30%, 50%, 90%? The analysis also assumes a design for the improvements (and no changes to the railroad bridge) such that barges will still have to weave between the two bridges.

Given the potential for a new bridge to cost \$1 to \$2 billion, it would be interesting to know how upgrading an existing bridge could be more expensive than building a new one.

- The memo offers conclusions that rule out re-use but does not provide the facts or analysis that support that conclusion. For example, the memo states: “Given their through-truss design, it is not prudent to widen the existing structures to meet current interstate highway design standards. Therefore, alternatives that keep interstate traffic on the existing bridge would not meet the project’s purpose and need.” Why isn’t it prudent?
- The memo treats meeting *all* of the current highways design standards as the sine qua non for any alternative, regardless of cost, or of cost relative to benefit. But why isn’t a cost-effective *improvement* in the current design a valid alternative, even if it means the entire project does not meet all of current standards? Is this a standard we have applied to other projects? Just changing this assumption could dramatically change the conclusions in the

³ More to the point, it is interesting that we have some kind of cost estimate for the overall project (\$1 to \$2 billion) without having had any formal cost estimates at all.

⁴ Is a two-day workshop on seismic safety sufficient basis for ruling out alternatives that might save hundreds of millions of dollars? Given the budget for this study it would seem a much more extensive study is justified.

memo. And what about nonstructural ways to increase safety, such as by reducing the speed limit?

- More importantly, there are no comparisons of the differences in costs and benefits between the re-use and replacement options.
- The memo puts great emphasis on how an arterial crossing would “likely substantially increase through-traffic in downtown Vancouver and on Hayden Island.... Motorists taking longer trips may divert to an arterial crossing...” increasing traffic in downtown, causing arterial congestion and interfering with pedestrian movement etc. Later in the memo, this increased traffic is described as inconsistent with local plans. (Page 9) But I do not see any similar consideration about what induced traffic effects there might be up and down I-5 from a new, wider, bridge and whether those alternatives are consistent with local land use plans or state planning requirements.

Some Recommendations:

- Recommend that before deciding on alternatives, especially with respect to re-use or replacement, the Task Force decide on the relative importance of the different objectives they have identified including travel/access, barge movement and safety objectives. It will probably be necessary to identify the objectives and their relative importance by both mode and market. Community development objectives should be added.
- Before narrowing the alternatives, prepare some preliminary cost/benefit information for all the alternatives, including structural and nonstructural solutions, seismic retrofits and covering a bigger geographic area than in the current alternatives. “Costs” means more than construction and demolition costs. Any land use effects and construction caused delays should be factored into the costs part of the equation.
- Add a land use alternative.
- Consider structural and nonstructural solutions involving I-205, the rail bridge and areas further north and south of the current project area.

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METRO

October 19, 2006

Mr. Hal Dengerink, Co-Chair
Mr. Henry Hewitt, Co-Chair
Columbia River Crossing Task Force
700 Washington Street, Suite 300
Vancouver, WA 98660

Dear Co-Chairs Dengerink & Hewitt:

The members of the Metro Council greatly appreciate the briefing about the Columbia River Crossing Project provided by the project staff at our work session on October 3. We are also grateful for the time, energy and dedication devoted to this important issue by both the project technical team and the members of the Task Force.

Any improvements on the Oregon side will ultimately need to be approved by the Metro Council, after careful consideration of public testimony, before proceeding. Accordingly, the Council concluded that it would be helpful to you if we were to present our perspectives on this project sooner rather than later. Of course, individual Councilors may have additional comments, but we all concur with the following recommendations.

Recognize the I-5 Transportation and Trade Partnership Strategic Plan

In 2002, all of the stakeholders in this effort, from both sides of the Columbia River, agreed with the following five principles:

- The Interstate 5 crossing of the Columbia River should be a maximum of five lanes in each direction (three through lanes and two auxiliary lanes), for a total of ten lanes to accommodate additional auto and truck travel. These lanes could be a combination of freeway, arterial and managed lanes.
- Light rail transit is an integral element of travel in this corridor, including service into Clark County. Premium express bus service in the I-5 and I-205 corridors should be provided to markets not well served by light rail.
- Jurisdictions in the Corridor will develop and agree on a plan to manage land use and development in order to avoid adversely impacting I-5 or the region's growth management plans. Land use changes could dramatically affect commuter patterns and future demands on the interstate highway system.

- Commitment to a comprehensive use of innovative measures such as Transportation Demand Management /Transportation System Management strategies.
- Establishment of an environmental justice program that addresses potential impacts.

While conditions and circumstances have changed somewhat since 2002 and we are not opposed to looking at additional information and ideas, we believe that in the absence of compelling data to the contrary, these principles provide balanced guidance for the project. In addition to the above principles, we recommend the following actions.

Use desired outcomes as a guide

The CRC has ably documented the transportation problems in the bridge influence area. However, we believe that the project would greatly benefit from clear definition and prioritization of desired outcomes. These desired outcomes should represent the common goals that all of us share in our region and should include actions that will enable us to achieve these joint goals. This approach will help the project avoid unintended consequences, and will ensure appropriate and realistic consideration of the geographic scope of the project's potential impacts.

As you know, the Metro Council has initiated an update to our Regional Transportation Plan (RTP). This RTP update represents a significant change in approach. The Council is developing policies that make it explicit that the transportation system is a means to achieving certain outcomes, including our regional land use plan. For example, level of service standards for identifying problems and designing solutions are rough methods that can be greatly improved and much better aligned with Council policies by creating new and better performance standards. We will need to work closely with you as your project proceeds and as the RTP policies are developed to ensure that your proposals are consistent with our new policies.

In addition, the Metro Council suggests the following desired outcomes for the Columbia River Crossing:

- Expand multi-modal choices for our citizens.
- Create a dazzling waterfront and gateway for both sides of the River. This includes actions that the Metro area could take to support the City of Vancouver's efforts to preserve and enhance their downtown.
- Improve the reliability of the transportation system for the freight industry.
- Maintain and improve air quality in the corridor.
- Explore how land use changes could help address the problem

One of the great challenges of transportation planning is that it is inextricably bound to land use. Transportation access greatly shapes land use and vice-versa. We believe that we cannot look at transportation solutions without considering land use. On both sides of the Columbia River, local jurisdictions have created land use plans that they hope to achieve. All transportation

solutions will play some role in either helping or hindering these plans. It is critical to coordinate land use and transportation.

Accordingly, we recommend that all transportation alternatives be evaluated for their land use implications. Obviously, added lanes of traffic, varying levels of transit, etc., and their impact on travel time and access will have an influence on settlement patterns and development. These implications need to be very carefully studied.

Determine project priorities

Your problem statement includes a great many challenges, not all of which are of equal weight. We recommend that you consider each problem element and related goal and determine how important it is compared with the others. In this way you will help communicate what the project is trying to accomplish and help understand why one approach may be favored compared with any other.

Recognize financial limitations

As you know, in a bit more than a year the Highway Trust Fund will be depleted. Resolution of this grave problem is critical, but a solution has not yet been found. In addition, maintenance and system preservation are taking ever-greater resources. Accordingly, we believe that transportation solutions must take into consideration cost, feasibility, and the place any one project may have in the overall transportation improvement picture. We must consider that there is an overall regional transportation budget that will not be able to fund every transportation need. Accordingly, we would be concerned that if a very costly project (initial capital costs as well as ongoing maintenance and preservation costs) were financed with revenues other than toll revenues, this could displace all other projects or greatly reduce the number of other projects because of limited funding resources. The Metro Council will be fiscally responsible when considering all public investments. Project cost and a comparison with the other projects proposed within the same time horizon will need to be considered.

Coordinate with the railroad bridge

As we noted with project staff on October 3, the marine navigation challenge of the Interstate 5 bridges is related to the downstream railroad bridge. We recognize that the CRC project is taking this issue into consideration, but believe that options that involve even greater coordination, including possible improvements to the railroad bridge, should be further explored. We understand that the railroad bridge is privately owned. However, we believe that the railroad system, including this bridge, performs a public function, and the freight carried on it is part of a larger system that needs to be considered. Further, if a CRC alternative further restricts barge turning movements, mitigation in the form of alterations to the railroad bridge may be warranted.

Provide alternatives in the DEIS that demonstrate the fundamental choices before us

We believe a wider range of alternatives must be studied in order to find the solutions that deliver the best results at the lowest costs. In addition, we believe that alternatives should be considered in the draft environmental impact statement that include both capital intensive and alternative approaches – unless it is clearly demonstrated during the current phase of analysis that such approaches are not viable.

Non-transportation solutions may be effective in concert with transportation improvements. It is important to demonstrate to the public that we are making every effort to solve problems in new ways and that we are good stewards of limited public resources. This will take extra effort and may lead to some solutions that ultimately may not be workable. But there is the chance that new innovative solutions could be created and we should not avoid some level of prudent risk in finding new answers to old problems.

Further, we believe that, in the absence of compelling information to the contrary, alternatives included in the environmental impact statement should include:

- 1) an alternative that reuses the present bridges;
- 2) an alternative that has a maximum of ten lanes (a combination of freeway, arterial and managed lanes).

Provide thorough public vetting before closing options

We recognize that in order to manage the project effectively, some options will need to be removed from consideration. However, before options are taken off the table, we believe that ample opportunity should be provided for community discussion and debate.

Again, we very much appreciate the work and dedication of the CRC technical team and Task Force members. It is our hope that by sharing our perspectives we can, working with all of the stakeholders, help create an effective and lasting solution to the complex challenges of the Columbia River Crossing.

Sincerely,

David Bragdon, President

Rex Burkholder, Councilor

Carl Hosticka, Councilor

Brian Newman, Councilor

Rod Park, Councilor

Susan McLain, Councilor

Robert Liberty, Councilor

cc: Doug Ficco, Co-Director, WSDOT
John Osborne, Co-Director, ODOT